



Andrew B. Smith, Esq.

*Admitted in NJ and NY*

4 Chatham Road, Suite 1

Summit, NJ 07901

P: 973.206.1725

F: 973.794.2589

andrew@sslawfirmllc.com

May 31, 2022

**VIA CM/ECF**

Magistrate Judge Anne Marie Donio  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets Room 1050  
Camden, NJ 08101

**Re: Estate of Edward Gandy, Jr. et al v. City of Millville et  
al Case No.: 1:20-CV-00641-NLH-AMD**

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Dear Judge Donio:

This firm represents Plaintiffs the Estate of Edward Gandy, Jr. and Shane Gandy ("Plaintiffs"). Pursuant to your order dated May 11, 2022, Plaintiffs respectfully request that the current deadline for pretrial factual discovery of May 31, 2022 be extended until July 31, 2022 so that the parties may complete the remaining fact witness depositions. Since the May 11 conference, the deposition of Defendant Officer Colt Gibson has been completed. Further, the depositions for the remaining Defendants who have entered an appearance have been scheduled for the following dates:

1. Defendant Chief Jody Farabella – June 16, 2022;
2. Nurse Christal Hardin – June 17, 2022; and
3. Defendant Dr. Marie Hasson, M.D. – June 28, 2022, or alternatively June 30, 2022.

Counsel have been cooperating in this process and are attempting to work together to get these depositions done as quickly as possible. Since there are additional fact witnesses outside the individual defendants recently identified in discovery who will need to be deposed and there are still three (3) defendants who have not answered yet who will have to be deposed regardless, I am requesting an extension until July 31, 2022. Thank you for your time and attention in this matter. If you have any questions, please do not hesitate to have a member of your staff contact me directly.

Respectfully,  
**SMITH + SCHWARTZSTEIN LLC**

/s/ Andrew Smith

By: \_\_\_\_\_  
Andrew B. Smith, Esq.

cc: Counsel of Record